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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843

Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**SUPPLEMENTAL INFORMATION
REQUESTED BY THE COURT'S
JULY 16, 2018 ORDER**

Pursuant to the Court's Order of July 16, 2018, and in further support of my application for lead counsel, I provide below (A) a description of the core team of lawyers at Levi & Korsinsky, LLP who will assist me in the litigation, including their biographies; and (B) a list of every Northern District of California case in which I have served as lead or co-lead counsel.

A. THE LEADERSHIP TEAM

Joseph E. Levi

Joseph E. Levi, a managing partner of Levi & Korsinsky, will lend his expertise in technology and computer programming to the case. In addition to his experience in class action litigation, Mr. Levi has an extensive technical background, which will be invaluable in effectively litigating the technology issues in this case, as well as in constructing appropriate injunctive relief for class members.

Mr. Levi obtained his Bachelor of Science, *summa cum laude*, in Electrical Engineering in 1984 and his Master of Science in Systems Engineering in 1986, both from Polytechnic University (now NYU Tandon School of Engineering). He graduated *magna cum laude* from Brooklyn Law School in 1995. Before graduating from law school, Mr. Levi worked as an engineer for ITT Avionics, creating software simulations of military communications systems. He also worked for the SIAC/NYSE, developing a trading system for floor specialists.

Mr. Levi is a registered patent attorney and drafted approximately 100 patents in various technical areas, including software systems. He has represented numerous patent holders in enforcing their patent rights in areas including computer hardware, software, communications, and information processing, and has been instrumental in obtaining substantial awards and settlements. He has brought infringement actions against numerous high-tech companies including IBM, Apple, and HP. Before founding Levi & Korsinsky, Mr. Levi worked at Kaye Scholer, Fierman, Hirshey, Handler & Leventhal LLP, and Clifford Chance where he litigated infringement matters in various technical areas including software and biotech.

Currently, Mr. Levi focuses on complex, class action litigation, including in the areas of securities fraud and consumer protection. Mr. Levi played a prominent role in the matter of *In re CNX Gas Corp. S'holder Litig.*, C.A. No. 5377-VCL (Del. Ch. 2010), in which plaintiffs successfully

1 recovered a common fund of over \$42.7 million for stockholders.

2 **Eduard Korsinsky**

3 Eduard Korsinsky is also a co-founding partner of Levi & Korsinsky. Mr. Korsinsky led the
4 investigation and filed the first case against Facebook in the Delaware Chancery Court challenging
5 the creation of new Class C shares, and therefore has significant knowledge regarding Facebook and
6 will lend his expertise in that regard. Additionally, since obtaining his law degree from Brooklyn
7 Law School in 1995, Mr. Korsinsky has gained over 20 years of experience representing clients in
8 complex litigation, including securities cases, derivative actions, consumer fraud, and other
9 commercial matters. He has been named a New York “Super Lawyer” by Thomson Reuters.

10 Mr. Korsinsky, along with Mr. Levi, successfully litigated *Bustos v. Vonage America, Inc.*,
11 No. 06-cv-02308 (D.N.J.), which challenged Vonage’s use of an unsuitable and unreliable
12 communications protocol for their Vonage Fax Service, achieving a common fund settlement of
13 \$1.75 million on behalf of class members. As an attorney, prior to founding his firm, Mr. Korsinsky
14 litigated *Lewis Tree Service, Inc. v. Lucent Techs. Inc.*, No. 0600192 (N.Y. Sup. Ct. 1999), a Y2K-
15 related class action which was part of a \$110 million settlement.

16 Before law school, Mr. Korsinsky ran a successful computer consulting business which built
17 computer hardware and wrote accounting and trading software. Like Mr. Levi, Mr. Korsinsky’s
18 technical background will provide significant value to the case.

19 **Courtney Maccarone**

20 Courtney Maccarone is a Senior Associate in Levi & Korsinsky’s New York office and a
21 member of the firm’s Consumer Protection practice group. She has experience managing class action
22 suits from beginning to end and is able to assist Ms. Rivas with the day-to-day responsibilities of the
23 case.

24 Ms. Maccarone graduated from Brooklyn Law School, *magna cum laude*, in 2011, and has
25 dedicated her entire legal career to representing consumers. Before joining Levi & Korsinsky,
26 Ms. Maccarone was a litigation associate at a class action firm in New York where she represented
27 consumers who bought falsely advertised and defective products. Since joining Levi & Korsinsky in
28 2014, Ms. Maccarone has continued to focus her practice on prosecuting consumer class actions and

1 has represented consumers in a wide range of false advertising, design defect, data breach, and food
 2 labelling cases in courts throughout the country, including in this District. She is currently working
 3 as part of the co-lead team litigating the *Intel Corp. CPU Marketing, Sales Practices and Products*
 4 *Liability Litigation*, No. 3:18-md-2828-SI (D. Or.), concerning security vulnerabilities in Intel's core
 5 processors.

6 Ms. Maccarone has been honored as a New York Super Lawyers "Rising Star" for the last
 7 five consecutive years.

8 **Andrea Clisura**

9 Andrea Clisura is a Senior Associate in Levi & Korsinsky's New York office. Ms. Clisura is
 10 highly skilled in brief writing and has significant experience briefing complicated issues of fact and
 11 evolving areas of law. She has been heavily involved in the briefing on class certification and
 12 summary judgement, and took primary responsibility for briefing *Daubert* motions relating to the
 13 parties' chemistry experts in *In re Amla Litigation*, No. 2:16-cv-6886 (S.D.N.Y), which is still
 14 pending. The instant action against Facebook and Cambridge Analytica will likely involve novel
 15 issues, including interpretation of the Stored Communications Act, 18 U.S.C. §§ 2701 *et seq.* These
 16 are issues about which there is limited case law and which will require extensive briefing.
 17 Ms. Clisura's exceptional skills in this regard will provide a significant benefit to the class.

18 After graduating *magna cum laude* from Brooklyn Law School in 2011, Ms. Clisura joined
 19 the consumer protection group of another New York based class action firm, representing consumers
 20 who bought mislabeled food products, homeopathic products, and appliances mislabeled as Energy
 21 Star qualified. She has litigated numerous statutory and common law claims under California
 22 law. Since joining Levi & Korsinsky in 2015, Ms. Clisura has continued to focus her practice on
 23 consumer class action litigation.

24 Ms. Clisura is also part of the co-lead team litigating the *Intel Corp. CPU Marketing, Sales*
 25 *Practices and Products Liability Litigation*, No. 3:18-md-2828-SI (D. Or.), involving claims that
 26 Intel's core processors give rise to serious security vulnerabilities that put consumers' sensitive
 27 personal data at risk of unauthorized access.

28 Since Levi & Korsinsky has over 30 attorneys, I am able to add more attorneys to the team

should the case require it. Attached as Exhibit A is a true and correct copy of the firm's resume, which includes a biography for each of its attorneys.

B. LIST OF NORTHERN DISTRICT OF CALIFORNIA CASES

In some of the cases I have litigated, the district courts have either appointed me individually, or my law firm, as lead or co-lead counsel. I list below the Northern District of California cases where such appointments were made and where I was the primary attorney responsible for the matter.

Case Name	Case Number	Judge
<i>Sung, et al. v. Schurman Fine Papers</i>	3:17-cv-02760-LB	Hon. Laurel Beeler
<i>In re 24 Hour Fitness Prepaid Membership Litig.</i>	4:16-cv-01668-JSW	Hon. Jeffrey S. White
<i>Lilly v. Jamba Juice Co., et al.</i>	3:13cv-02998-JST	Hon. Jon S. Tigar
<i>In re Sony Other OS Litig.</i>	4:10-cv-01811-YGR	Hon. Gonzalez Rogers
<i>In re Facebook, Inc. PPC Advertising Litig.</i>	4:09-cv-03043-PJH	Hon. Phyllis J. Hamilton

Respectfully submitted,

Dated: July 17, 2018

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